

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

LUKE STEWART and LATASHA)	
STEWART, individually, and as guardians and)	
next friends of A.S., a minor child, AMANDA)	
GREEN and BOBBY GREEN II, individually,)	
and as parents and next friends of D.G. and)	
D.G., minor children, JENNIFER WATKINS,)	
individually, and as parent and next friend of)	
B.J. and L.T., minor children,)	
RAPHAEL WATKINS, individually, and as)	Case No. 4:16-cv-00488-JED-FHM
guardian and next friend of B.J. and L.T.,)	
minor children, and KALUB MURRAY,)	
individually,)	
)	
Plaintiffs,)	
)	
v.)	
)	
BROTHERHOOD MUTUAL)	
INSURANCE COMPANY,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO FILE MOTIONS FOR WITHDRAWAL OF FUNDS
FROM MINOR CHILDREN'S TRUST ACCOUNTS UNDER SEAL**

COMES NOW Jennifer Murray (f/k/a Jennifer Watkins) as parent and next friend of minor child, B.J., and Amanda Green, as parent and next friend of minor child, Do.G., and hereby move this Court for an Order allowing them to file their respective Motions for Withdrawal of Funds from Minor Child's Trust Account under seal.

Counsel for Plaintiffs has conferred with counsel for Defendant, who has indicated that Defendant **does not** object to Plaintiffs' request herein.

In support of this unopposed Motion, the undersigned advises the Court as follows:

Ms. Murray and Ms. Green intend to file Motions for Withdrawal of Funds on behalf of their respective minor children, B.J. and Do.G. Said Motions will ask the Court to allow B.J. and

Do.G., through their mothers, to withdrawal a certain sum of money from the trust accounts of B.J. and Do.G. to be used for the purchase of various items for the use and benefit of said minor children. As such, the Motions will contain the amount of the confidential settlement agreement entered between the parties and approved by this Court, the location of the financial institution where the minor children's trust accounts are located, as well as the amount of the settlement funds in each of the respective accounts. In order to protect the confidentiality of the settlement reached between Plaintiffs and Defendant, Ms. Murray and Ms. Green need to file their Motions under seal.

RELIEF REQUESTED

Jennifer Murray, as parent and next friend of minor child, B.J., and Amanda Green, as parent and next friend of minor child, Do.G., respectfully request that the Court grant the instant Motion and enter an Order allowing them to file their respective Motions for Withdrawal of Funds from Minor Child's Trust Account under seal. A proposed Order granting the requested relief is submitted contemporaneously herewith.

Respectfully submitted,

/s/ Andrea R. Rust

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ Andrea R. Rust